



Many Voices Working for the Community

# Advocate

## SSABs Seek Unity in "Common Values" Task

*By Steve Kopp, ORSSAB Chair*

Although the eleven site specific advisory boards (SSABs) around the country have basically the same mission, they are as disparate in their individual makeup and workings as the children of any family would be. The environmental challenges faced by the boards vary greatly, and the communities and regions they represent are as diverse as the U.S. itself.



*Eleven SSABs are currently in operation across the country. Monticello disbanded this year, following completion of site activities there.*

But while challenges and geography may separate us, some issues, such as health and safety, long-term stewardship, and funding, affect all sites in the DOE complex and bring us together. The SSABs discuss these topics, and many others, at our semiannual "chairs'

meetings," and we have worked collaboratively on three inter-SSAB workshops: the Low-Level Waste Workshop, hosted by Nevada in August 1998; the Waste Transportation Workshop, hosted by Fernald in May 1999; and the Long-Term Stewardship Workshop, hosted by Oak Ridge in October 1999.

Through these interactions, we have come to realize that we have much to benefit from working together on complex-wide concerns. At the February Chairs' Meeting in Idaho Falls, we took an important step in finding common ground on these concerns by establishing a process to codify our mutual values and interests.

Since February, via e-mail messages and conference calls, we have worked to create a statement that spells out these "Common Values," as the process has come to be called. The working draft is still a long way from being finished, but progress is steady, and we expect to have the statement in final form at the conclusion of our next chairs' meeting in August. Our hope is that this statement will serve as the cornerstone for greater interaction and solidarity among the SSABs.

It's not easy getting a group as diverse as the SSABs to agree on anything, but working toward consensus is important, and I believe, ultimately achievable. As Thomas Payne said in 1776, "It is not in numbers, but in unity, that our great strength lies."

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## New Board Members on the Way

For the first time in quite awhile, ORSSAB is on its way to attaining full Board membership.

DOE Oak Ridge Operations (DOE ORO) has forwarded the names of 7 prospective Board members and 11 alternates to DOE-Headquarters, and Teresa Perry, ORSSAB'S DOE ex officio, expects appointments to be made in time for the new members to be seated at the June 7 meeting.

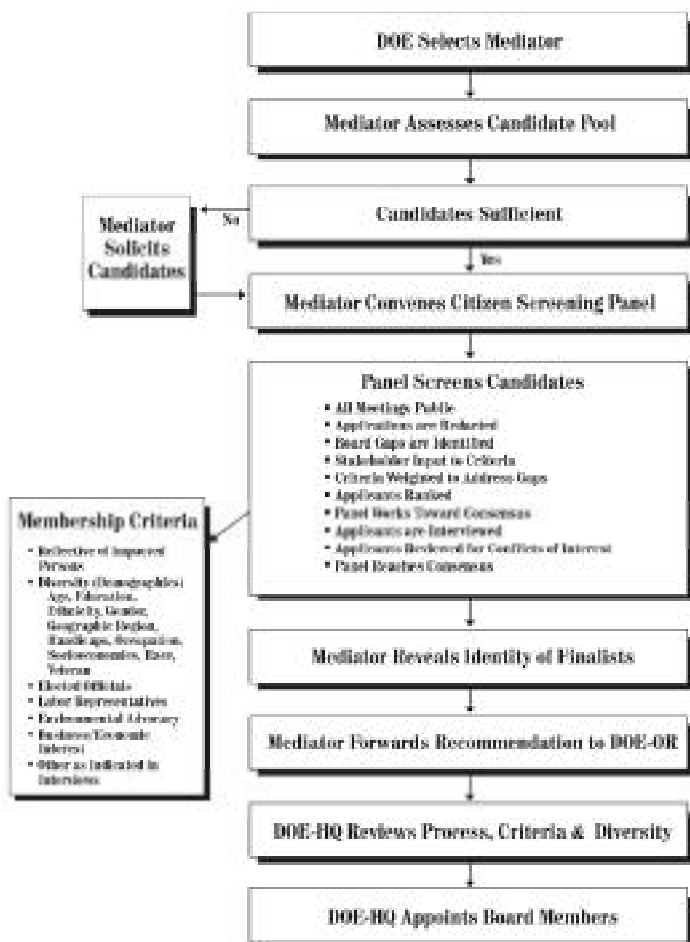
Up to 20 persons may sit on the Board, but with the resignation of Robert Blaum in April, membership had dropped to 13.

The recruitment drive which closed February 28 resulted in a significant number of highly qualified applicants. The applications were

forwarded to an independent membership screening panel on March 1, and selections were made and delivered to DOE-ORO on March 30.

ORSSAB has one of the most rigorous selection processes in the DOE complex (see diagram), which assures that the Board adequately represents the diversity of the population surrounding the Oak Ridge Reservation.

DOE and the Board Process Team have developed a comprehensive training plan to get new members up to speed quickly on how the Board works and what's going on in the EM Program. The plan includes an orientation booklet, a reference manual, training sessions, and a tour of the reservation.



## Meet the SSAB

In this issue of the *Advocate* we feature three of our members. You'll meet more in future *Advocate* issues.



### Jake Alexander

Jake is regulatory compliance manager for BNFL's D&D Project at the East Tennessee Technology Park.

He is also a member of the adjunct faculty with the University of Tennessee's Engineering Graduate School. He served on the Oak Ridge Health Agreement Steering Panel and is a former member of the Oak Ridge Environmental Quality Advisory Board. Jake is leader of the Environmental Restoration Team.



### Jeff Cange

Jeff is an Anderson County resident and a project manager/technical specialist. He holds a masters degree in geology

and water resources engineering and is a registered professional geologist. Jeff is the leader of the Budget & Prioritization Team.



### Luther Gibson, Jr.

Luther holds an M.S. degree in chemical engineering and works in the Lockheed Martin Energy Systems

Analytical Chemistry Organization. He has worked for DOE contractors for 23 years on environmental technologies. He was 1998-99 chair of the East Tennessee Chapter of the Air & Waste Management Assn. and is co-leader of the Waste Management Team.

# Recent Recommendations and Comments

## Recommendation on Formation of Panel to Examine New Technology Alternatives to Incineration

*DOE-Headquarters is convening a blue-ribbon panel to study alternatives to incineration. This will affect Oak Ridge because TSCAI may be the only active DOE incinerator by the end of the year, and it may be eventually shut down. Following is an abridged version of ORSSAB's recommendation to Secretary Richardson, prepared by the Waste Management Team.*

For this panel to be a truly national, we believe DOE sites with incineration facilities should be represented, and we request that the Oak Ridge SSAB be allowed to nominate a representative.

Oak Ridge is the only DOE site in the country with an incinerator (TSCAI) that treats wastes contaminated with radionuclides, hazardous constituents, and PCBs. Our Board has studied TSCAI extensively over the years; we have sponsored public meetings on its operations, participated in a blue-ribbon panel appointed by the Governor, and made review of TSCAI an ongoing activity of our Waste Management Committee.

Having a stakeholder representative from Oak Ridge will add value to the panel's deliberations by providing perspectives that could only have been achieved by participating in the study of a facility as unique as TSCAI. Oak Ridge has a vested interest in participating on any panel charged with examining alternatives to incineration. While the focus for this issue may have begun with construction of an incinerator at INEEL, we believe it makes sense to allow sites affected by the panel's

recommendations to take an active role in its deliberations.

## Recommendations and Comments on the Draft Environmental Assessment (EA) for the Sale of Zinc Bromide Solutions for Commercial Recycling and Reuse, DOE/EA-1324, February 2000

*This EA deals with DOE's proposal to sell 4000 gallons of used zinc bromide solutions for commercial use. Following is an abridged version of ORSSAB's comments, prepared by Jake Alexander and the Waste Management Team.*

The SSAB has concluded that neither the action decision DOE contemplates nor the analysis of issues contained in the draft EA seem particularly relevant to the requirements of the National Environmental Policy Act (NEPA).

It has been determined that the material in question is neither low-level radioactive waste nor RCRA hazardous waste. As such, the solutions can be released as surplus property in accordance with procedures that do not involve NEPA evaluations. In addition, the principle technical element of the EA analysis involves the protocols established in DOE Order 5400.5 for the release of "residual radioactive materials." Again, neither this order nor the protocols cited would seem applicable to these materials.

The SSAB recommends that DOE discontinue any further attempts to address this action under NEPA and simply advise the State of Tennessee that these solutions are not low-level radioactive or hazardous wastes and that all references to these materials can be deleted from the Site

Treatment Plan. Should DOE elect to issue the EA, we request that the following comments be addressed.

We find that, although the inventory of used zinc bromide solutions stored at ETTP may be safely released for recycling, the evaluation and decision-making process require more clarification than provided.

A more thorough discussion may be useful of the process in DOE Order 5400.5 to determine that the radionuclide levels of DOE-owned zinc bromide are not statistically different from the levels found in virgin material and any similarity to the No-Radioactivity-Added (NRA) determinations for hazardous waste to be shipped off-site for commercial treatment, storage, or disposal.

DOE Order 5400.5 states that no guidance is available for release of volumetrically contaminated materials but that such materials may be released if criteria and survey techniques are approved by EH-1. NRA determinations are understood to have standards for use of process knowledge, analytical results, or combination of the two. Process knowledge is understood to include adequate knowledge of the history of the material and that it was not exposed to unconfined radioactive material or particle beams capable of causing activation. The change in characterization of this material as a waste and removal from service at ORNL to a storage facility at ETTP may indicate a deficiency in process knowledge, and any gap in process knowledge undermines the hypothesis that no radioactivity has been added. Discussion of process knowledge should be added.

# Recent Recommendations and Comments

## Recommendations and Comments on the *Draft Environmental Impact Statement (EIS) for Treating Transuranic/Alpha Low-Level Waste at the Oak Ridge National Laboratory, Oak Ridge, Tennessee, DOE-EIS-0305-D, February 2000*

*The EIS details alternatives for disposing of 1000 cubic meters of solid wastes and 660,000 gallons of liquid and sludge, most of which DOE plans to ship to the transuranic waste at the Waste Isolation Pilot Plant (WIPP) in New Mexico. Following is an abridged version of ORSSAB's comments on the document, which were prepared by the Waste Management and Stewardship teams.*



*Proposed TRU waste treatment facility.*

In February 1999, DOE said it was constructing a new road to the Transuranic (TRU) Waste Treatment Facility under a categorical exclusion. We find no exclusion applicable to construction of the road, and we believe DOE violated the National Environmental Policy Act (NEPA) and its DOE NEPA Implementing Procedures by (1) not preparing an environmental assessment for the construction of the road or (2) not including construction of the road in the Draft Environmental Impact Statement (EIS) for Treating TRU/Alpha Low-Level Waste. Since the road is complete, ORSSAB

recommends that DOE include the impacts of road construction in the final EIS.

Alternative 5: The public has been led to believe that TRU waste will be treated on site, and following treatment, the product will be transported to WIPP for disposal. We recognize that some of the treated remote-handled TRU waste may remain on site until waste acceptance criteria at WIPP are determined. However, such short-term storage is quite different from a decision to keep all treated waste in Oak Ridge indefinitely. We find Alternative 5 unacceptable for the following reasons:

- a feasible stewardship plan for long-term storage is lacking;
- the costs and funding of long-term monitoring and maintenance are not addressed;
- the effects on community image and future land use are not correctly considered;
- the more expensive vitrification process would

likely be required to decrease any impacts to human health and the environment during indefinite storage without maintenance.

Thus, ORSSAB recommends that:

- Alternative 5 be deleted from the final EIS or be altered to provide for only short-term storage in Melton Valley for a period of no more than 30 years,
- the final EIS find the current Alternative 5 unacceptable, or
- the inherent problems associated with Alternative 5 be fully assessed in the final EIS.

ORSSAB is inclined to agree with selection of the preferred alternative of low-temperature drying for the Melton Valley Storage Tank wastes (sludge and supernate) and segregation for the solid wastes, assuming that the relative differences in impacts of the alternatives for the proposed action remain as presented.

That the preferred alternative will actually achieve RCRA land disposal restriction standards in the event that WIPP is not accepting remote-handled TRU waste in time to meet the TDEC Commissioner's Order is of concern.

The issues of extraction of buried waste for treatment and transportation on the Oak Ridge Reservation need to be addressed. Relying on other documents for this documentation does not allow the reader to understand the operations. Interface problems between two systems, e.g., transportation and facility, are often the most problematic aspects of a waste handling operation.

We would like to know if the three treatment options have ever been used on a large scale for materials similar to these waste. If the technology is unproven, that should be acknowledged, and discussion of how to handle unexpected problems should be included.

The document, in general, is not user-friendly and does not meet the expectations of the public in regard to other public documents from the EM Program. In fact, there are enough errors in the Executive Summary alone that it leads one to question if more complex errors are buried in the technical sections.



# Project Team News

ORSSAB project team meetings serve as forums where the issues affecting the Oak Ridge Reservation are studied and debated. All meetings are open to the public, and meeting times and locations are available on the Board's Web site ([www.oakridge.doe.gov/em/ssab/](http://www.oakridge.doe.gov/em/ssab/)) and through the ORSSAB 24-hour information line (865-576-4750). Following is a status check of recent and planned team activities.



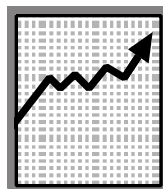
## Board Process

The team has been busy with several important issues, such as criteria for evaluating student applicants to the Board and the role of team co-leaders at Executive Committee meetings. Two other items have been high on the agenda at each team meeting: planning for the Board's annual retreat and training for the new members scheduled to join the Board this summer. Both projects are well underway and should greatly enhance the Board's processes in these key areas.



## Environmental Restoration

To prepare for commenting on upcoming DOE documents, the team has been studying the reservation watersheds and has received briefings on the status of ongoing and proposed projects. A tour of selected projects is in the works to help team members understand them better. In April, team leader Jake Alexander co-authored Board comments and recommendations on the *Draft Environmental Assessment (EA) for the Sale of Zinc Bromide Solutions for Commercial Recycling and Reuse*.



## Project Baseline

On February 15, the team and DOE co-sponsored a public meeting on the DOE Oak Ridge

Reservation Environmental Management (EM) Program budget at the Jacobs Technical Center. Approximately 30 persons attended the meeting, which focused on budgets for fiscal years 2000, 2001, and 2002. The team and DOE are planning another meeting for early summer focusing on the EM life cycle baseline, which defines the overall scope, schedule, and cost for completing EM cleanup activities and forms the basis for the *Paths to Closure* documents.

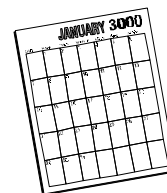


## Public Outreach

In February, team members made presentations to the Environmental

Sciences and Environmental Law classes at the Roane State Community College Oak Ridge campus and to the Oak Ridge Breakfast Rotary. On March 15, the team sponsored a public meeting on diversity requirements for environmental management contractors at the Jacobs Technical Center. Bob Brown, Assistant District Director of the Office of Federal Contract Compliance Programs, made the presentation. On April 28, team members traveled to Clinton to brief the Anderson County Executive's Office on ORSSAB activities. In early May, team members met with the *Knoxville News-Sentinel* Oak Ridge Bureau and the Economic Development Committee of the Knoxville Area Chamber Partnership. The team is currently planning additional presentations to local civic, business, and

governmental organizations and is reviewing and revising presentation materials and preparing training for all Board members on how to make presentations.



## Stewardship

In February, the Board endorsed the Stewardship Working Group's *Oak Ridge Reservation*

*Stakeholder Report on Stewardship, Volume 2*. Since then the team has created a checklist and tracking chart to help ORSSAB follow up on recommendations made in the report. In April, the team submitted recommendations and comments on the *Draft EIS for Treating Transuranic/Alpha LLW at ORNL*, and in May, the team submitted comments on the *D1 FY 2000 Remediation Effectiveness Report*.



## Waste Management

In April, the team provided recommendations and comments on the

*Draft EIS for Treating Transuranic/Alpha LLW at ORNL* and on the *Draft EA for the Sale of Zinc Bromide Solutions for Commercial Recycling and Reuse* (in collaboration with the Environmental Restoration Team). The team has also been closely monitoring TSCAI operations and the opening of the Nevada Test Site to Oak Ridge wastes streams. The team recently recommended that the Board send up to six members to tour the Nevada Test Site and the Waste Isolation Pilot Plant.

# ORSSAB's First Student Representative Says Farewell



By Anne-Marie Wiest, ORSSAB Student Representative

As the first student representative on the Oak Ridge SSAB, I felt eager and honored to be asked to fill such a position. Now that my term is over, I would like to share my thoughts with you on my appointment.

In the SSAB's invitation I saw an opportunity to deepen my knowledge of environmental projects taking place in my community, as well as the opportunity to steep myself in a higher caliber of civic involvement. More importantly, I felt a sense of

obligation to respond to this invitation. As a member of the younger generation, I am well aware of the demands on us to be involved in environmental issues and to be taken seriously by our elders. I saw this invitation as an opportunity to be included, and to decline would have been remiss. I have taken seriously the efforts of the Board to make contact with my generation because I feel that if we make light of such opportunities they will cease to exist for young people in the future.

I truly have valued the experience the ORSSAB has given me. The members of the Board have made me feel welcome, and the support staff and Public Outreach Team have been exceedingly gracious and patient. I have gained a greater understanding of the role I may play in my

community that has broadened my definition of civic duty.

I would like to thank and acknowledge my Environmental Science teacher, Dr. Nita Ganguly, for having sparked and encouraged my interest in the environmental sciences; Bill Pardue, chair of the Board upon my arrival; Steve Kopp, current chair of the Board; the other Board members; and my parents.

One year is not enough time to become as familiar with the SSAB as I would like to be, but my enrollment at Maryville College, where I will be majoring in biology this fall, prevents me from applying for Board membership at this time. I may, however, appear at meetings, and at some point in the future I should be glad to return as a regular member.

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